

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced)	
E911 Emergency Calling Systems)	
)	

To: The Commission

**Carrier Report of Missouri RSA #5 Partnership Regarding Implementation
of Wireless E911 Phase II Automatic Location Identification**

Missouri RSA # 5 Partnership d/b/a Chariton Valley Wireless Services ("Chariton Valley") hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI"), in compliance with the Federal Communications Commission's ("FCC" or "Commission") Further Memorandum Opinion and Order in the above-captioned proceeding.

I. Background / Contact Information

Chariton Valley serves rural Missouri and its contact information is as follows:

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Assistant General Manager

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II. E911 Phase II Location Technology Information

Chariton Valley is reviewing both network and handset solutions for its ALI solution. Since a pure handset-based TDMA solution may not be available in the required timeframe, Chariton Valley is considering other alternatives such as a network-based solution, or a hybrid, for its Phase II ALI technology. Network-based location technology uses a locating function within or as an overlay to the wireless network

infrastructure using Time Difference of Arrival, or Angle of Arrival, or Location Pattern Matching, or a combination thereof. Chariton Valley is concerned that the initial capital expenditures plus on going costs could create a hardship. Availability of products and cost will naturally impact Chariton Valley's final decision on which technology to implement for compliance with the Commission's rules. Whichever technology Chariton Valley chooses, it intends to deploy it throughout its service area.

Chariton Valley's review of site-based products yields a cost in the range of approximately \$575,000 to \$1,035,000 for their network to be compliant with Phase II ALI capability.¹ On going operational costs are undetermined, but expected to be significant on a per subscriber basis.

III. Testing and Verification

Chariton Valley has yet to test any ALI solutions since it is still examining feasible solutions and is waiting on more product information. Chariton Valley anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of the technology it eventually chooses.

IV. Implementation Details and Schedule

Chariton Valley is still awaiting product availability and firm pricing to compare vendor products before it can develop an implementation schedule. Chariton Valley will continue to evaluate ALI solutions and intends to select and deploy a technology after the first quarter of 2001. Chariton Valley will accelerate this schedule to the extent necessary upon receipt of a PSAP request.

V. PSAP Interface

Chariton Valley has yet to receive a Phase II PSAP request. Chariton Valley does expect to encounter major hardware and or software changes in order to transmit Phase II data to PSAPs once its system is up and running.² However, many of the transmission details remain up to the PSAP.

¹ While the public interest of providing Phase II capability overrides most cost concerns, Chariton Valley, with only 9,000 subscribers, is still searching for an economically feasible solution. Chariton Valley notes that the opportunities for cost recovery in rural Bucklin, Missouri by marketing ALI capabilities are not as prevalent as such opportunities in urban areas.

² In general, the following hardware and software is needed to transmit Phase II data to PSAPs: IS41C – Dialed Number Trigger, E911 Software, MPC – Mobile Positioning Center, PDE – Position Determining Entity, and receivers at each cell site.

VI. Handset Information

If Chariton Valley decides to pursue a handset-based solution, it will run promotions in order to replace existing handsets. The price of the new ALI-capable handsets, unavailable at this time, will affect Chariton Valley's replacement strategy.

VII. Other Information

Chariton Valley notes that the remote and rural nature of its service territory in Missouri can present additional and unforeseen problems when installing and testing location technology. Chariton Valley would have a much better handle on how it will eventually implement its Phase II plan if the vendor products were available for testing. Unfortunately, Chariton Valley's Phase II implementation plan depends, in large part, upon the schedules and plans of the vendors.

November 9, 2000